

Message

From: Paul Miller [pmiller@nescaum.org]
Sent: 3/12/2021 3:35:10 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]; Carbonell, Tomas [Carbonell.Tomas@epa.gov]
CC: Wayland, Richard [Wayland.Richard@epa.gov]; Koerber, Mike [Koerber.Mike@epa.gov]; Johnson, Steffan [Johnson.steffan@epa.gov]; Werner, Jacqueline [Werner.Jacqueline@epa.gov]; Segall, Martha [Segall.Martha@epa.gov]; Dombrowski, John [Dombrowski.John@epa.gov]; Wood, Anna [Wood.Anna@epa.gov]; Lassiter, Penny [Lassiter.Penny@epa.gov]; French, Chuck [French.Chuck@epa.gov]; Lisa Rector [lrector@nescaum.org]
Subject: Advance copy of NESCAUM report reviewing EPA's residential wood heaters NSPS Step 2 certification program
Attachments: nescaum-review-of-epa-rwh-nsps-certification-program-202103.pdf

Hi Joe and Tomás,

Please find attached a NESCAUM report we're publicly posting on our website next Monday, March 15th. The report presents the results of a review by NESCAUM on the adequacy of the residential wood heater NSPS Step 2 certification program. We developed this report in coordination with on-going reviews by the Alaska Department of Environmental Conservation looking at wood device testing reports submitted to EPA for Step 2 certification. We've been discussing our concerns about the certification program with your staff since last September, and these results should not be a surprise. In sum, we feel there are serious problems with the way wood burning devices (stoves and central heaters) are certified for compliance with Step 2. This is regardless of whether there's intentional manipulation of the testing, or arguably allowed under the existing test methods.

We are not doing a press release when the report goes public, but we and AK have had interviews with reporters from Alaska Public Media and The Guardian, and I expect they'll do stories early next week.

We will continue to work constructively with EPA staff to address these issues, and are looking forward to future progress. -Paul

Paul J. Miller, Executive Director
Northeast States for Coordinated Air Use Management (NESCAUM)
89 South St., Suite 602
Boston, MA 02111
Ph: 617-259-2016
www.nescaum.org